



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street

San Francisco, Ca. 94105

MEMORANDUM

SUBJECT: Proposed Remedial Action Plan for Ordot
Landfill, Guam

FROM: Kathy Diehl, A-1-1 *Kathy Diehl*
Air Toxics Office

TO: Rick Sugarek, T-4-3
Toxics and Waste Management Division

The above document was reviewed and we have the following preliminary comments:

1. The landfill should be screened to determine the specific organic compounds found at the landfill surface. The instruments used thus far to survey the air composition at the landfill surface do not distinguish between specific organic compounds and cannot detect chlorinated hydrocarbons. There is some indication that vinyl chloride, chlorobenzene and phenols maybe present at the landfill. These and other potential hydrocarbons should be screened for so that the data may be used to determine whether additional samplings/monitoring is required and in general determine the remedial action to be taken at Ordot.

2. Potential air related ARARs for Ordot may be Guam EPA's Rule 2, "Ambient Air Quality Standards;" Rule 3, "Permits Required;" Rule 4, "Monitoring, Records, and Reporting;" Rule 5, "Sampling and Testing Methods;" and Rule 11, "Control of Odors in Ambient Air." All NAAQS apply to Ordot.